

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF VIRGINIA  
ABINGDON DIVISION**

**UNITED STATES OF AMERICA**       :  
   :  
**v.**   :  
   :  
**WILLIAM B. SINK**                       :  
   :

**No.** 1:23CR28

**AGREED STATEMENT OF FACTS**

This Agreed Statement of Facts briefly summarizes the facts and circumstances surrounding the criminal conduct of William B. Sink (“Sink”) in this case. It does not contain all the information discovered during the investigation or applicable to an accurate Presentence Investigation Report or sentencing guidelines calculation. This Agreed Statement of Facts is not protected by proffer agreement or any other agreement, and it shall be wholly admissible at trial notwithstanding any rules or statutes to the contrary.

On or about and between June 1, 2022, and November 18, 2022, Mr. Sink was a resident of Lebanon, Virginia, which is within the Western District of Virginia.

During the relevant period, Mr. Sink and an unidentified co-conspirator known as “Vanessa” participated in a scheme to cause vendor invoice payments totaling \$1.4 million to be wired by Cirrus Design Corporation (“Cirrus”), a Minnesota-based provider of personal aircraft, to a sham business bank account, for purposes of intentionally defrauding Cirrus and obtaining money to which they were not entitled.

Specifically, on July 25, 2022, at the direction of “Vanessa,” Mr. Sink created a fictitious business, The Rockn U Farms LLC, for the purpose of fraudulently obtaining wire transfers from Cirrus. Mr. Sink subsequently opened a business checking account in the name of The Rockn U Farms LLC and a personal checking account at Truist Bank in Lebanon, Virginia. Mr. Sink was

the sole authorized signor on both Truist accounts. Other than an initial \$100 deposit to open each account, the proceeds of the fraudulent transfers described below were the only funds held by the business account or personal account.

On October 7, 2022, The Rockn U Farms LLC fraudulently received a wire transfer from Cirrus in the amount of \$169,570.16, into the fake company's Truist business account. The receipt for the wire transfer, which was found in Mr. Sink's possession in April 2023, indicated that Cirrus intended to pay a vendor, Enviro Systems, Inc., when it disbursed the wire. However, as a result of a business email compromise scheme, Cirrus was given fictitious wire instructions for Enviro Systems, Inc., directing payment to The Rockn U Farms LLC account. Within days of receiving the first fraudulent wire transfer from Cirrus, Mr. Sink made the first of several cash withdrawals of the proceeds and utilized additional proceeds for personal debit card expenditures at various locations, including fast food restaurants, Walmart, and the ABC store in Lebanon, Virginia.

The Rockn U Farms LLC business account received a second wire transfer from Cirrus on October 13, 2022, in the amount of \$159,975.68. The receipt for the wire transfer, which was found in Mr. Sink's possession in April 2023, again indicated that Cirrus intended to pay a vendor, Enviro Systems, Inc. Mr. Sink transferred \$167,980.00 and \$158,100.00 of the proceeds from Cirrus to his personal account on October 13, 2022, and October 17, 2022, respectively.

On October 21, 2022, The Rockn U Farms LLC account received a third wire transfer from Cirrus in the amount of \$1.1 million. The receipt for the wire transfer, which was found in Mr. Sink's possession in April 2023, again indicated that Cirrus intended to pay a vendor, Enviro Systems, Inc. Mr. Sink immediately transferred \$569,000.00 of the wire proceeds to his personal account.

Soon after transferring the proceeds of the Cirrus wire transfers from The Rockn U Farms LLC business account to his personal account, Mr. Sink wired \$167,913.00 from his personal account to a Coinbase, Inc. account in Mr. Sink's name, and \$157,000.00 to an FTX account in Mr. Sink's name. Coinbase, Inc. and FTX are California-based cryptocurrency exchanges.

On October 24, 2022, Coinbase, Inc. returned \$161,319.14 to Mr. Sink's personal account at Truist Bank due to suspected fraudulent activity. On November 18, 2022, Truist Bank returned nearly \$1.3 million of the fraudulent wires to Cirrus and closed the business account and the personal account.

The remaining total loss to Cirrus from the scheme is \$173,053.66. Mr. Sink personally benefitted from the scheme in the amount of \$9,459.80, including \$4,800 in cash and check withdrawals, \$3,000 in transfers to Mr. Sink's Cashapp account, and \$4,659.80 in debit card expenditures, all from the proceeds Mr. Sink fraudulently obtained from Cirrus.

To summarize, the evidence would show that on or about and between June 1, 2022, and November 18, 2022, in the Western District of Virginia and elsewhere, Mr. Sink, as a principal and aider and abettor, devised and intended to devise a scheme and artifice to defraud and to obtain money and property by means of materially false pretenses, representations, and promises. It was part of the scheme that Mr. Sink created a fictitious company and opened related bank accounts to fraudulently obtain money from Cirrus, as previously set forth. For the purpose of executing such scheme and artifice and attempting to do so, Mr. Sink transmitted and caused to be transmitted by means of wire communication in interstate commerce writings, signs, signals, and sounds, including, but not limited to, fraudulent money transfers from Cirrus to The Rockn U Farms LLC and subsequent fraudulent money transfers to Coinbase, Inc. and FTX.

This is not all the government's evidence, but it establishes the elements of the charges to which Mr. Sink is pleading guilty.

By signing below, William B. Sink affirms that he has reviewed this statement of facts with his attorney, and that he agrees it is true and accurate. He further agrees that, had this matter proceeded to trial, the government would have proven the facts outlined above beyond a reasonable doubt.

11-7-23  
Date

William B. Sink  
William B. Sink  
Defendant

11-7-2023  
Date

Nancy Dickenson-Vicars  
Nancy Dickenson-Vicars  
Assistant Federal Public Defender

11-27-2023  
Date

Lena L. Busscher  
Lena L. Busscher  
Assistant United States Attorney